



Dwellingplace

May 21, 2007

Michigan State Housing Development Authority
735 East Michigan Avenue
Lansing, MI 48912

To Whom It May Concern:

Enclosed you will find my testimony in response to the Michigan State Housing Development Authority's request for comments and recommendations regarding modifications to the Qualified Allocation Plan (QAP).

Thank you for your consideration.

Sincerely,

Dennis Sturtevant
Chief Executive Officer

Enclosure
/kl



**Testimony to the Michigan State Housing Development Authority
Comments & Recommendations on
Modifications to the Qualified Allocation Plan (QAP)**

May 21, 2007

My name is Dennis Sturtevant. I am the current Chief Executive Officer for Dwelling Place of Grand Rapids. I have been in this position since January of 1989. Dwelling Place has participated in the development of 16 LIHTC projects in West Michigan since its inception. We are proud of the many housing units we have created and preserved using this important financing vehicle.

There are two facts that cause my comments to be relatively brief in response to your request for feedback concerning the QAP. The first fact is that there is NO "draft" QAP to react to as has been the case in the past. Instead the public is being asked to provide open ended comments and input to MSHDA as it considers a potential redesign of the QAP. This is difficult to do given the many different directions such a discussion could be taken.

The second fact is that several esteemed organizations have already submitted input to MSHDA regarding the QAP design including comments regarding the process for seeking input to redesign the QAP. The organizations I am referencing include CEDAM, the Housing Council and the Corporation for Supportive Housing. I have had the opportunity to review CSH's comments, CEDAM's comments and the Housing Council's comments including both their April 27th and May 10th testimony.

After having completed my review of their comments, I noted how similar their respective comments are. Although the Corporation for Supportive Housing offered several very specific recommendations regarding the future QAP, most of everyone's feedback was focused on the need for predictability, fairness and sufficient MSHDA staffing support to complete the review process in a timely fashion. CSH made several suggestions regarding increased targeting for lower income and disabled populations which I believe are worthy of support. The Housing Council, on the other hand, emphasized the importance of developing strategies to ensure that sufficient rental subsidies and/or funds for support services are attached if there is an increase in targeting of these populations. Both of these groups are right, in our opinion.

101 Sheldon Blvd. SE, Suite 2 • Grand Rapids, MI 49503 • Phone: 616 454-0928 • Fax: 616 454-5249 • TDD: 800 649-3777



Equal Housing Opportunity
Equal Opportunity Employer



There does not appear to be support for wholesale alteration of the QAP from any of the groups offering comments. We would concur.

Both CEDAM and the Housing Council have emphasized the importance for the creation of a process for ongoing annual dialogue regarding changes that might improve the QAP, in addition to the opportunity to offer feedback at an annual hearing for that purpose. We agreed with this.

CEDAM has suggested the need for outcome evaluation over an extended period of time to determine the effectiveness of various strategies in the QAP to achieve specific results. We support this direction as well.

In short, Dwelling Place would like to offer our unqualified support and endorsement for all of the comments provided by CSH, the Housing Council and CEDAM. We did not see that any of the comments offered were in conflict with each other although we believe that some of the specific recommendations made by CSH can only be successful if attention is paid to the concerns raised by the Housing Council concerning "unfunded mandates".

Most importantly we recommend that CEDAM and the Housing Council's request for the creation of a more formal process for ongoing dialogue be implemented.

Finally, we do have one unique and specific recommendation not incorporated into the previously referenced comments. MSHDA has placed great emphasis in their strategic plan for prevention of urban sprawl, redevelopment of downtowns, core cities and small communities. Presently, the small projects set aside allows projects to be placed anywhere there is market support and where environmental issues can be addressed. Perhaps more emphasis should be placed on targeting these resources to commercial districts and downtowns in small communities where mixed use development can be achieved. Perhaps the set aside for this activity could be increased or more priority could be awarded for projects in commercial districts.

Thank you for this opportunity to share our thoughts concerning the Qualified Allocation Plan.

Dennis Sturtevant
Chief Executive Officer
Dwelling Place of Grand Rapids